IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

Case No. 1:20-bk-00774-HWV

MONICA LAFRANCES ALTAMURA, : Chapter 13

Debtor

REGENTS' GLEN :

HOMEOWNERS' ASSOCIATION, INC., :

Movant

:

v. : Motion for Relief from Automatic Stay

by Regents' Glen Homeowners' Association, Inc.

MONICA LAFRANCES ALTAMURA

Respondent

DEBTOR'S ANSWER TO MOTION FOR RELIEF FROM AUTOMATIC STAY

AND this 28th day of March, 2023, the Debtor, by and through her attorney, Dawn Marie Cutaia, files this Answer as follows:

- 1. Admitted.
- 2. Admitted.
- 3. Admitted.
- 4. Admitted.
- 5. Admitted.
- 6. Admitted.
- 7. Admitted.
- 8. Admitted that it is Debtor's primary residence.
- 9. Admitted in part; Denied in part. Debtor is behind but she is not sure of the

amount.

10. Admitted.

- 11. Admitted that Debtor is behind; she is not sure of the exact amount.
- 12. Admitted.
- 13. Denied.
- 14. Admitted.
- 15. Denied.
- 16. Admitted.
- 17. As provided herein, the amount due to Movant will increase each month.
- 18. Denied

Wherefore Debtor respectfully requests this Honorable Court dismiss the Motion for Relief and allow Debtor to cure any post-petition arrears that may have accrued through an amended Plan.

Respectfully submitted,

/s/ Dawn Marie Cutaia Attorney for Debtor 717-304-1841 dmcutaia@gmail.com

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